

EXHIBIT 2

EXHIBIT 2**TABLE 1: DISCHARGE PROHIBITION B VIOLATIONS**

Date	Location	Cause
August 17, 2019	Discharge Point No. 001	“The bypass is believed to have been caused by an inconsistent power supply unit feeding the bypass valve that caused the valve to intermittently and erratically open and close.”
April 6, 2020	Discharge Point No. 001	“chopper pump programming”
December 17, 2020	Discharge Point No. 001	“Grit/sand accumulation in the Westside Transport/Storage Structure’s East Box negatively affected the pumps’ capacity.”
February 15, 2021	Discharge Point No. 001	“Decant discharge pumping occurred early due to a misreading of the OSP influent flow meter.”
January 1, 3 & 10, 2023	Discharge Point No. 001	“flooding of the lowest level of the Westside Pump Station, which damaged the level sensors controlling influent pumping to OSP. The damage continued to affect pump station operations in January. Specifically, influent pumping to OSP was impacted on January 1, 3, and 10.”
March 21, 2023 (unknown whether bypass or CSDs occurred)	Discharge Point No. 001	“the Programmable Logic Control (PLC) controlling the Westside Pump Station pumps failed. As a result, all communication at the Westside Pump Station was lost and OSP influent and decant pumps stopped. . . The cause of the PLC failure was damage caused to the fiber cables by rodents.”
November 28, 2023	CSD-007	“The cause of the discharge was human error. Staff on-site were draining a tank associated with the Sea Cliff No. 2 PS force main to prepare for an inspection related to a pump station capital improvement project. The dewatering rate and sump volume was exceeded and resulted in a discharge.”
November 29, 2023	Discharge Point No. 001	“One of the three OSP influent pumps tripped, limiting peak influent flow to approximately 48 MGD. . . . At 4:56 a.m. operations initiated decant pumping to prevent a CSD from the Lincoln/Vicente outfalls.”
February 4–5, 2024	CSD-002 & CSD-003	“a power loss occurred at the Westside Pump Station (WSS) which stopped all flows to OSP and decant to SWOO. At the time of the power loss, pumping to OSP and SWOO was at maximum capacity. From approximately 5:45 p.m. on 2/4 to 7:50 a.m. on 2/5, WWE Operations staff utilized a backup generator to run a pump which averaged a flow of 20 MGD to OSP.”
March 29, 2024	Discharge Point No. 001	“At 12:30 p.m., Lift Pump #1 failed to pump additional flows due to a mechanical issue. At about 3:30 p.m., Lift Pump #2 failed due to an electrical issue.”

EXHIBIT 2**TABLE 2: DISCHARGE PROHIBITION D VIOLATIONS**

Date	Location	Cause
November 28, 2023	CSD-007	“The cause of the discharge was human error. Staff on-site were draining a tank associated with the Sea Cliff No. 2 PS force main to prepare for an inspection related to a pump station capital improvement project. The dewatering rate and sump volume was exceeded and resulted in a discharge.”

EXHIBIT 2**TABLE 3: NINE MINIMUM CONTROLS VIOLATIONS**

Date	Permit Term	Location	Cause
December 31, 2022	Maximize flow to treatment plant. Provision VI.C.5.a.iv.	CSD-001 – CSD-003	“flooding of the lowest level of the Westside Pump Station, which damaged the level sensors controlling influent pumping to OSP, which stopped the OSP influent pumps at approximately 12:50 p.m.”
January 1, 3 & 10, 2023	Maximize flow to treatment plant. Provision VI.C.5.a.iv.	Discharge Point No. 001	“flooding of the lowest level of the Westside Pump Station, which damaged the level sensors controlling influent pumping to OSP. The damage continued to affect pump station operations in January. Specifically, influent pumping to OSP was impacted on January 1, 3, and 10.”
March 21, 2023 (unknown whether flow to treatment plant was maximized)	Maximize flow to treatment plant. Provision VI.C.5.a.iv.	Discharge Point No. 001	“the Programmable Logic Control (PLC) controlling the Westside Pump Station pumps failed. As a result, all communication at the Westside Pump Station was lost and OSP influent and decant pumps stopped. . . The cause of the PLC failure was damage caused to the fiber cables by rodents.”
November 28, 2023	Prohibit dry weather combined sewer overflows. Provision VI.C.5.a.v.	CSD-007	“Staff on-site were draining a tank associated with the Sea Cliff No. 2 PS force main to prepare for an inspection related to a pump station capital improvement project. The dewatering rate and sump volume was exceeded and resulted in a discharge.”

EXHIBIT 2**TABLE 4: LONG TERM CONTROL PLAN VIOLATIONS**

Date	Permit Term	Location	Cause
November 26, 2019	“the total flow rate at Discharge Point No. 001 did not reach 165 million gallons per day (MGD) within two hours of discharges at CSD-002 and CSD-003” in accordance with Provision VI.C.5.c.iv(c).	CSD Outfalls	“Two of the wet weather ‘decant’ pumps at the Westside Pump Station were activated but were not pumping due to an electrical issue. . . . After investigation staff identified an issue with two main disconnect switches. . . . During the November 26 storm, Operations staff remotely activated all four decant pumps at the Westside Pump Station, but the main disconnect switches for the variable frequency drives for pump nos. 6 and 7 were in a neutral position.”
April 6, 2020	“INF-001 did not reach 60 MGD prior to initiating discharge from the Westside Transport/Storage Structure to Discharge Point No. 001” in accordance with Provision VI.C.5.c.iv(b).	Discharge Point No. 001	“chopper pump programming”
December 17, 2020	“OSP influent flow did not reach 60 MGD before discharge from the Westside Transport/Storage Structure to Discharge Point No. 001 (decant) occurred” in accordance with Provision VI.C.5.c.iv(b).	Discharge Point No. 001	“Grit/sand accumulation in the Westside Transport/Storage Structure’s East Box negatively affected the pumps’ capacity.”
February 15, 2021	“OSP influent flow did not reach 60 MGD before discharge from the Westside Transport/Storage Structure to Discharge Point No. 001 (decant) occurred” in accordance with Provision VI.C.5.c.iv(b).	Discharge Point No. 001	“Decant discharge pumping occurred early due to a misreading of the OSP influent flow meter.”

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November 28, 2023	Capture for treatment, or storage and subsequent treatment, 100 percent of the combined wastewater and stormwater flow collected in the combined sewer system. Provision VI.C.5.c.iii.	CSD-007	“Staff on-site were draining a tank associated with the Sea Cliff No. 2 PS force main to prepare for an inspection related to a pump station capital improvement project. The dewatering rate and sump volume was exceeded and resulted in a discharge.”
November 29, 2023	“decant (EFF-001D) was initiated prior to influent flow reaching 60 MGD” in accordance with Provision VI.C.5.c.iv(b).	Discharge Point No. 001	“One of the three OSP influent pumps tripped, limiting peak influent flow to approximately 48 MGD. . . . At 4:56 a.m. operations initiated decant pumping to prevent a CSD from the Lincoln/Vicente outfalls.”
February 4–5, 2024 (unknown whether CSDs would have occurred in absence of power loss)	The flow at Discharge Point No. 001 shall be at least 165 MGD within 2 hours of a discharge from Discharge Point No. CSD-002 or CSD-003. Provision VI.C.5.c.iv(c).	Westside Pump Station	“a power loss occurred at the Westside Pump Station (WSS) which stopped all flows to OSP and decant to SWOO. At the time of the power loss, pumping to OSP and SWOO was at maximum capacity. From approximately 5:45 p.m. on 2/4 to 7:50 a.m. on 2/5, WWE Operations staff utilized a backup generator to run a pump which averaged a flow of 20 MGD to OSP.”
March 29, 2024	The Oceanside Water Pollution Control Plant shall have an instantaneous influent flow rate of at least 60 MGD prior to initiating discharge from the Westside Transport/Storage Structure to Discharge Point No. 001.		“At 12:30 p.m., Lift Pump #1 failed to pump additional flows due to a mechanical issue. At about 3:30 p.m., Lift Pump #2 failed due to an electrical issue. At about 6 p.m., electricians arrived on site to reset Lift Pump #2 and influent flows increased to more than 43 MGD; Lift Pump #1 was not able to be restored during this storm. From about 1:30-10:00 p.m., decant pumping occurred to empty the Westside T/S box and prevent a CSD event.”